



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

May 21, 2024

**BY ECF**

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Reclaim the Records, et ano., v. U.S. Department of State*, No. 23 Civ. 1529 (VEC)

Dear Judge Caproni:

This Office represents the United States Department of State (the “Government”) in the above-referenced action brought pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 522. I write respectfully to request a thirty-day extension of the May 24, 2024 deadline for the Government to file its reply papers in further support of its motion for summary judgment and in opposition to Plaintiffs’ cross-motion, to June 26, 2024, and a corresponding extension of the deadline for Plaintiffs’ reply, if any, to July 3, 2024.

This is the first request by the Government for an extension for its reply/opposition papers, but the Court previously granted the parties several extensions of the briefing schedule. The Government needs more time to arrange for a declaration from an agency contractor to respond to the technical points raised by Plaintiffs’ papers. In addition, the Government intends to submit a supplemental declaration from Ms. Regina Ballard to address the parties’ declarations/arguments, but she will be away the end of this month. Plaintiffs consent to the requested extension.

We thank the Court for its consideration of this letter.

Respectfully submitted,

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Southern District of New York  
*Attorney for Defendant*

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cc: Plaintiffs’ counsel (by ECF)